

Message

From: Gonzalez, Iris [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=876C423D267B417D90DD3831BA40934D-GONZALEZ, D]
Sent: 12/20/2022 9:00:04 PM
To: Tripathi, Arati [Tripathi.Arati@epa.gov]
Subject: RE: Summary of Clean Harbors application - response to Gen Honore

Hi Arati,

Yes, most of this letter is outdated. I believe General Honore is in the know on most of these items. The only thing that may be good to relay is this paragraph:

In your email, there was a specific concern raised regarding the destruction removal efficiency (DRE) of the proposed contained burn chamber system along with the comment that the DRE should be 99.9999% (6-Nines) instead of 99.99% (4-Nines). A 6-Nines DRE is mandatory for incinerators that burn PCB and dioxin-containing wastes. The proposed permit prohibits burning of PCB and dioxin-containing waste at this facility. Incinerators (and all other hazardous waste combustors) burning hazardous wastes with nondioxin/furan organic hazardous air pollutants, must achieve 4-Nine's DRE and comply with dioxin/furan emission standards. In addition to the required 4-Nine's DRE and dioxin/furan emission standards, hazardous waste combustors must comply with carbon monoxide and hydrocarbon standards and other requirements related to combustion efficiency. These requirements ensure optimum combustion conditions are maintained (i.e., the needed time, temperature, and turbulence that you referenced).

Also, we could let him know that we plan to visit again in January before the public comment period ends.

Can we shorten the response to two paragraphs and have Dr. Nance send that tomorrow?

Delia Iris Gonzalez (she/her/ella) (please call me Iris)

Chief of Staff for the Regional Administrator, Region 6
(Arkansas, Louisiana, Oklahoma, New Mexico, Texas & 66 Tribal Nations)
U.S. Environmental Protection Agency
1201 Elm Street, Suite 500
Dallas, Texas 75230
Office: (214) 665-2107
Cell: (b) (6)
Email: Gonzalez.Iris@epa.gov

From: Tripathi, Arati <Tripathi.Arati@epa.gov>
Sent: Tuesday, December 20, 2022 9:12 AM
To: Gonzalez, Iris <Gonzalez.Iris@epa.gov>
Subject: FW: Summary of Clean Harbors application - response to Gen Honore

Hi Iris,

This is the email chain regarding the response to Gen Honore on Colfax. If you scroll down, there are emails forwarded to Dr Nance from General Honore on 11-3, and an email from Dr Nance on 11-4 saying she would like to respond.

I don't think the draft response that LCRD prepared on 11-18 (attached here) made it to the front office for review, and it would probably need to be updated in some places.

Before I reach out to Monica, I want to check if this is something we should continue working on. From Dr Nance's comments this morning, it sounds like she thinks we are in a good place and didn't think there were any outstanding emails to respond to – additionally, we are gearing up for engagements with the community early in the new year.

Please let me know what you think!

Thanks,
Arati

From: Smith, Monica <smith.monica@epa.gov>
Sent: Monday, December 19, 2022 8:21 AM
To: Gonzalez, Iris <Gonzalez.Iris@epa.gov>; Tripathi, Arati <Tripathi.Arati@epa.gov>; Maguire, Charles <maguire.charles@epa.gov>
Cc: Dwyer, Stacey <Dwyer.Stacey@epa.gov>; Trim, JEWELINE <Trim.Jill@epa.gov>; Acevedo, Janie <Acevedo.Janie@epa.gov>
Subject: FW: Summary of Clean Harbors application - response to Gen Honore

Good morning - Can you let us know if this response was sent to Gen Honore?

Monica

Monica Smith
Acting Deputy Division Director
Land, Chemical, and Redevelopment Division
214-665-6780 (office)

Ex. 6 Personal Privacy (PP) (EPA mobile phone)
smith.monica@epa.gov

From: Smith, Monica
Sent: Monday, November 21, 2022 11:15 AM
To: Trim, JEWELINE <Trim.Jill@epa.gov>
Cc: Crossland, Ronnie <Crossland.Ronnie@epa.gov>; Smith, Melissa <Smith.Melissa@epa.gov>; Shah, Harry <shah.harry@epa.gov>; Acevedo, Janie <acevedo.janie@epa.gov>
Subject: FW: Summary of Clean Harbors application

Jill – can you please route this draft letter to ORC and External Affairs (Jeff McAtee) for review. The draft has been reviewed by Ronnie and Janie Acevedo. The RA will be signing the final letter.

Monica Smith
Acting Deputy Division Director
Land, Chemical, and Redevelopment Division
214-665-6780 (office)

Ex. 6 Personal Privacy (PP) (EPA mobile phone)
smith.monica@epa.gov

From: Acevedo, Janie <Acevedo.Janie@epa.gov>
Sent: Monday, November 21, 2022 11:04 AM
To: Smith, Monica <smith.monica@epa.gov>; Havlik, Carl <havlik.carl@epa.gov>
Cc: Crossland, Ronnie <Crossland.Ronnie@epa.gov>; Smith, Melissa <Smith.Melissa@epa.gov>; Shah, Harry <Shah.Harry@epa.gov>
Subject: RE: Summary of Clean Harbors application

Good morning,

I have no concerns or edits to the letter...

Janie

From: Smith, Monica <smith.monica@epa.gov>
Sent: Friday, November 18, 2022 2:37 PM
To: Acevedo, Janie <Acevedo.Janie@epa.gov>; Havlik, Carl <havlik.carl@epa.gov>
Cc: Crossland, Ronnie <Crossland.Ronnie@epa.gov>; Smith, Melissa <Smith.Melissa@epa.gov>; Shah, Harry <Shah.Harry@epa.gov>
Subject: FW: Summary of Clean Harbors application

Janie and Carl - Charles and Stacey asked LCRD to draft a response to General Honore's email November 3, 2022 email to Dr. Nance regarding Clean Harbors (see email thread below). The attached file is LCRD's initial draft. Please let us know if you need any additional information.

Monica

Monica Smith
Acting Deputy Division Director
Land, Chemical, and Redevelopment Division
214-665-6780 (office)
Ex. 6 Personal Privacy (PP) EPA mobile phone)
smith.monica@epa.gov

Begin forwarded message:

From: "Maguire, Charles" <maguire.charles@epa.gov>
Date: November 4, 2022 at 2:02:45 PM CDT
To: "Crossland, Ronnie" <Crossland.Ronnie@epa.gov>
Cc: "Seager, Cheryl" <Seager.Cheryl@epa.gov>, "Osbourne, Margaret" <osbourne.margaret@epa.gov>
Subject: FW: Summary of Clean Harbors application

OK Ronnie... back to you for input.

From: Nance, Earthea <Nance.Earthea@epa.gov>
Sent: Friday, November 4, 2022 1:13 PM
To: Dwyer, Stacey <Dwyer.Stacey@epa.gov>; Maguire, Charles <maguire.charles@epa.gov>; Gonzalez, Iris <Gonzalez.Iris@epa.gov>
Subject: RE: Summary of Clean Harbors application

Yes, you are right Stacey. It was LCARD, not Enforcement. Of course Melissa is the lead on Colfax. Charles, please go straight to Melissa and let her know we need assistance with a brief letter response to the community/advocacy groups. It's time we updated them on where we, especially in light of the email chain below. Thanks.

-E

From: Dwyer, Stacey <Dwyer.Stacey@epa.gov>
Sent: Friday, November 4, 2022 12:50 PM
To: Nance, Earthea <Nance.Earthea@epa.gov>
Subject: RE: Summary of Clean Harbors application

Regarding the Clean Harbors application, it was mainly LCRD (Melissa Smith), not Enforcement. I recommend Charles should start with Melissa. Melissa worked on the OB/OD guidance comments, options with HQ contractor to evaluate the waste that have alternative technology, and options for reducing several components.

Ex. 5 DP / Ex. 7(A)

From: Nance, Earthea <Nance.Earthea@epa.gov>
Sent: Friday, November 4, 2022 12:32 PM
To: Maguire, Charles <maguire.charles@epa.gov>; Gonzalez, Iris <Gonzalez.Iris@epa.gov>; Dwyer, Stacey <Dwyer.Stacey@epa.gov>; Tripathi, Arati <Tripathi.Arati@epa.gov>; Vaughn, Gloria <Vaughn.Gloria@epa.gov>; Shaikh, Taimur <Shaikh.Taimur@epa.gov>
Subject: RE: Summary of Clean Harbors application

Hi Charles,

Ex. 5 Deliberative Process (DP)

-E

From: Maguire, Charles <maguire.charles@epa.gov>
Sent: Friday, November 4, 2022 12:12 PM
To: Nance, Earthea <Nance.Earthea@epa.gov>; Gonzalez, Iris <Gonzalez.Iris@epa.gov>; Dwyer, Stacey <Dwyer.Stacey@epa.gov>; Tripathi, Arati <Tripathi.Arati@epa.gov>; Vaughn, Gloria <Vaughn.Gloria@epa.gov>; Shaikh, Taimur <Shaikh.Taimur@epa.gov>
Subject: RE: Summary of Clean Harbors application

I know Ronnie is doing lots on the permitting side. I've asked Ronnie David Troy and John for non-enforcement ideas from their divisions.

From: Nance, Earthea <Nance.Earthea@epa.gov>
Sent: Friday, November 4, 2022 10:53 AM
To: Maguire, Charles <maguire.charles@epa.gov>; Gonzalez, Iris <Gonzalez.Iris@epa.gov>; Dwyer, Stacey <Dwyer.Stacey@epa.gov>; Tripathi, Arati <Tripathi.Arati@epa.gov>; Vaughn, Gloria <Vaughn.Gloria@epa.gov>; Shaikh, Taimur <Shaikh.Taimur@epa.gov>
Subject: FW: Summary of Clean Harbors application

Team,

I would like to respond to this. We have done groundbreaking work on Clean Harbors/Colfax, but much of our work is enforcement confidential so I need assistance in preparing a brief email response that addresses what we are actually doing. Of course we are being accused of not doing enough, but in this case that's not true.

-E

From: Russel Honore' <russel.honore@gmail.com>
Sent: Thursday, November 3, 2022 8:14 PM
To: Nance, Earthea <Nance.Earthea@epa.gov>
Subject: Fwd: Summary of Clean Harbors application

Lets talk about this please

----- Forwarded message -----

From: Michael Tritico <michaeltritico> Ex. 6 Personal Privacy (PP)
Date: Thu, Nov 3, 2022 at 7:51 PM
Subject: Re: Summary of Clean Harbors application
To: Anne Rolfes <anne@labucketbrigade.org>, Brian Salvatore <brian.salvatore@lsus.edu>, Darryl Malek-Wiley <darryl.malek-wiley@sierraclub.org>, GreenARMY <green-army@googlegroups.com>, Jack Reno Sweeney <jack@labucketbrigade.org>, Jacques Morial <jacquesmoria> Ex. 6 Personal Privacy (PP), Kim in Goodell <goodell> Ex. 6 Personal Privacy (PP), Naomi Yoder <naomi@healthygulf.org>, Terrell, Kimberly A <kterrell1@tulane.edu>, Russel Honore' <russel.honore> Ex. 6 Personal Privacy (PP)

Interesting. My first quick reading of the material brought to mind the years we spent trying to get LDEQ and EPA to understand that the hazardous waste incinerators at PPG in Calcasieu and Rollins in Baton Rouge were actually chlorinated dioxin/furan generators instead of destroyers because their Three T's (*Time* in the flame, *Temperature* in the flame, and *Turbulence* in the flame) were not sufficient to destroy the precursors but were ideal for creating the much more toxic and bioaccumulative chlorinated double-ringed molecules. We finally forced a 6-Nines guidance that the companies eventually claimed they could attain.

Despite the apparent actual existing presence of dioxins and PCBs in the Clean Harbors material their "Contained Burn Chamber System" will have a DRE or Destruction Removal Efficiency of 99.99% which is only 4-Nines.

Why LDEQ and EPA would allow that much lower DRE than for the incinerators that still at 6-Nines created long-lasting problems is bewildering to me.

Maybe I am just too tired and old to see something wonderful about the Clean Harbors situation. (I do think if I were a regulator there to watch a trial burn I would do it with a strong pair of binoculars, not right up close!)

Michael Tritico
Restore Explicit Symmetry To Our Ravaged Earth

On Thursday, November 3, 2022 at 06:57:41 PM CDT, Russel Honore' <russel.honore> Ex. 6 Personal Privacy (PP) wrote:

Please read and provide comments thanks.

----- Forwarded message -----

From: BRENDA VALLEE <bfvallee> Ex. 6 Personal Privacy (PP)
Date: Thu, Nov 3, 2022 at 6:54 PM

Subject: Summary of Clean Harbors application

To: Cephas Bowie <cbowiejr@csuchico.edu> Ex. 6 Personal Privacy (PP), Bill Wiegner <bwiegner@lsus.edu> Ex. 6 Personal Privacy (PP), Billy O'Neal <boshrir@csuchico.edu> Ex. 6 Personal Privacy (PP), Donna Tyler <donn@csuchico.edu> Ex. 6 Personal Privacy (PP), Jimmy Hodges <snjhodg@lsus.edu> Ex. 6 Personal Privacy (PP), Dolores Blalock <dplalock@csuchico.edu>, Brian Salvatore <brian.salvatore@lsus.edu>, Samuel Mims <mims@csuchico.edu> Ex. 6 Personal Privacy (PP), Ron Hagar <hagar@csuchico.edu> Ex. 6 Personal Privacy (PP), John Munsen <beema@csuchico.edu> Ex. 6 Personal Privacy (PP), Russel Honore <russel.honore@csuchico.edu> Ex. 6 Personal Privacy (PP), Mary Jo Smith <mjdsmith@lsus.edu> Ex. 5 Deliberative Process (DP), Marylee Orr <marylee@leanweb.org>, Michael Orr <michael@leanweb.org>, Chris in Baton Rouge <chris@lacag.org>, Christopher S. Oliver <coliver6@tulane.edu>, Devin Lowell <dlowell@tulane.edu>, Laura Olah <info@cswab.org>

Folk, I made a mistake and left off the attachment, Thank you to those of you who caught my mistake.

Wilma provided a summary of CH application. Open burning/open detonation continues as part of their proposed plan. The contained burn chambers have some problems.

Be sure to put the needed data on your email or written comments you hand in.,

Best Regards, LT General Russel Honore (Ret) www.generalhonore.com (404) 227-1527 See/Smell Something, Say Something, Do Something. Take a picture Call 911

Best Regards, LT General Russel Honore (Ret) www.generalhonore.com (404) 227-1527 See/Smell Something, Say Something, Do Something. Take a picture Call 911